

**CRAWFORD STREET CORPORATION**

P.O. Box 10047  
Portland, Oregon 97296-0047  
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PDPSF  
11.3.258.1V3  
4/12/01

April 12, 2001

Mr. Tom Gainer  
Oregon Department of Environmental Quality  
2020 SW Fourth Ave., Suite 400  
Portland, OR 97201

Re: Crawford Street Corporation, 8424, 8524 N. Crawford St. Portland, OR

Dear Tom,

I have received your letter of April 9, 2001 proposing modified comments on the Sampling and Analysis Plan (SAP) for the Crawford Street Corporation site. The proposed modifications in your letter are consistent with our understanding of the outcome of our April 5, 2001 meeting with you and Mike Rosen, and we are prepared to implement the investigative work as set forth in our January 26, 2001 SAP as amended by your requests for additional analyses. However, there are a couple of clarifications we would like to make.

- The first full paragraph on page 2 notes *three* newly discovered pipes along the riverfront. As indicated in the April 4, 2001 memorandum to you from Bridgewater Group, there are only two newly discovered pipes.
- As we noted briefly in our meeting on April 5th, the Clark County (Washington) background metal concentrations do not appear to be applicable to the Crawford Street site, especially for samples collected along the riverfront. A baseline concentration was established for many contaminants (including metals) from the Weston/EPA sediment sampling results. These baseline concentrations were used by DEQ to identify "elevated" concentrations of contaminants along upland sites and to initiate site investigations on the upland properties (including the Crawford Street site). Although we believe that these Willamette River baseline concentrations are more appropriate for comparison to site sample concentrations, we will include the Clark County background concentrations in our evaluation, as requested.
- Comparison of TCLP concentrations with ambient water quality criteria is not appropriate. The inclusion of TCLP analyses in our previous SAP was intended to allow comparisons with the cleanup levels in the DEQ Soil Cleanup Table. The aggressive leaching conditions represented by the TCLP test would be expected to overstate the contaminant concentrations that might result in water as a result of contaminants leaching from soil. However, we will perform the TCLP test and include the ambient water quality criteria in our evaluation.

USEPA SF

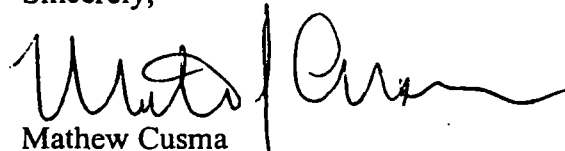


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We are currently scheduled to start the field work on April 24, 2001. Based on typical laboratory turnaround times, laboratory results should be available by early May. Please call if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mathew Cusma', written over the printed name.

Mathew Cusma  
Environmental Administrator  
(503) 286-6944

cc: Mike Rosen